

**UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF NEW YORK**

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VALENTINO DIXON,

Plaintiff,

v.

Civil Action No. 19-cv-01678

**NOTICE OF MOTION TO SEAL**

CITY OF BUFFALO, et al.,

Defendants.

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**NOTICE OF MOTION TO SEAL DOCUMENT**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of Peter Sahasrabudhe, Esq., Defendants the City of Buffalo (hereinafter “the City”), Mark Stambach, Raniero Masecchia, James Lonergan, John Vickerd, Richard Donovan, and various John Does identified as Unknown Buffalo Police Department Supervisors (collectively referred to hereinafter as “the City Defendants”), move this Court for leave to file under seal an excerpt of a reinvestigation memo created by the Erie County District Attorney’s Office. Said excerpt is referenced as Exhibit 51 to the previously filed Declaration of Peter A. Sahasrabudhe (Dkt. No. 174-76), which was filed in support of the City Defendants’ motion for summary judgment.

Counsel for Plaintiff and the County of Erie consent to the relief requested herein, and no opposition is expected.

Dated: January 18, 2024

Respectfully submitted,

/s Peter A. Sahasrabudhe

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